

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

AMERICAN TOWER ASSET SUB, LLC,

Plaintiff,

vs.

PTA-FLA, INC. d/b/a Cleartalk,

Defendant.

Case No. 6:15-cv-03700-MGL

**CONSENT MOTION TO
WITHDRAWAL MOTION AND
LEAVE TO AMEND PLEADINGS**

Pursuant to Fed. R. Civ. P. 15, Plaintiff and Counterclaim Defendant American Tower Asset Sub, LLC, on the one hand, and Defendant and Counterclaimant PTA-FLA, Inc., on the other, by and through their respective counsel of record, hereby move this Court as follows:

1. Plaintiff seeks leave to withdraw its Fed. R. Civ. P. 12(c) motion for judgment on the pleadings [Docket # 21];
2. Plaintiff seeks leave to amend its complaint and Defendant seeks leave to amend its answer and counterclaim;
3. Plaintiff seeks leave to file its amended complaint on or before May 18, 2016.
4. Defendant seeks leave to file its answer to amended complaint and amended counterclaim on or before May 25, 2016.
5. Plaintiff will answer or respond to Defendant's amended counterclaim on or before June 1, 2016.

[SIGNATURE PAGE ATTACHED]

WE SO MOVE:

/s/ Joshua E. Austin

Joshua E. Austin Fed. ID No. 12001
Post Office Box 8839
Columbia, South Carolina 29202
PHONE: (803) 466-6488
FACSIMILE: (866) 498-3090
joshuaaustin@cleartalk.net

ATTORNEY FOR DEFENDANT
PTA-FLA,INC. d/b/a/ CLEAR TALK

/s/ Burl F. Williams

Jeffrey S. Tibbals Fed ID No. 9387
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
PHONE: 843.577.9440
FACSIMILE: 843.414.8219
JTibbals@nexsenpruet.com

Burl F. Williams Fed ID No. 10556
55 E. Camperdown Way, Suite 400 (29601)
P.O. Drawer 10648
Greenville, SC 29603
PHONE: 864.282.1165
FACSIMILE: 864.477.2633
BWilliams@nexsenpruet.com

ATTORNEYS FOR PLAINTIFF
AMERICAN TOWER ASSET SUB, LLC

May 11, 2016
Greenville, South Carolina